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9 Attorney for Defendant
10 GAL YIFRACH

11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 v.
16 GAL YIFRACH, et al.,
17 Defendant.

CASE NO. 2:22-CR-00046 WBS

STIPULATION CONTINUING STATUS
CONFERENCE TO AUGUST 15, 2022, AT 9:00
A.M. AND FOR EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT AND [PROPOSED]
ORDER

18 **STIPULATION**

19 Plaintiff United States of America, by and through its counsel of record, and defendants, by and
20 through their counsel of record, hereby stipulate as follows:

21 1. By previous order, this matter was set for a status conference before this Court on
22 May 9, 2022.

23 2. By this stipulation, the defendants now move to continue this status conference and set a
24 status conference for August 15, 2022, and to exclude time between May 9, 2022, and August 15, 2022,
25 at 9:00 a.m., under Local Code T4.

26 3. The parties agree and stipulate, and request that the Court find the following:

27 a) The government has produced 142,689 pages of numbered discovery to
28 defendants, which includes copies of documents and recordings; and, the government is in the
process of reviewing additional materials for production in discovery consisting of a number of

1 electronic devices seized including phones, laptops and various external storage devices, as well
2 as email accounts.

3 b) Counsel for each defendant desires additional time to familiarize themselves with
4 the case and review the voluminous discovery, discuss the case with their respective clients and
5 the attorney for the United States, and otherwise prepare for trial.

6 c) Counsel for the defendants believes that failure to grant the above-requested
7 continuance would deny them the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendants in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of May 9, 2022, to August 15, 2022,
15 at 9:00 a.m., inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)
16 [Local Code T4] because it results from a continuance granted by the Court at the defendants'
17 request on the basis of the Court's finding that the ends of justice served by taking such action
18 outweigh the best interest of the public and the defendants in a speedy trial.

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1 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

5 Dated: May 2, 2022

PHILLIP A. TALBERT
United States Attorney

7 /s/ ROGER YANG
8 ROGER YANG
Assistant United States Attorney

9 IT IS SO STIPULATED BY ALL DEFENDANTS.

10 Dated: May 2, 2022

/s/ DAVID W. DRATMAN
11 DAVID W. DRATMAN
Counsel for Defendant GAL YIFRACH

13 Dated: May 2, 2022

/s/ MALCOLM S. SEGAL
14 MALCOLM S. SEGAL
Counsel for Defendant
15 SCHNEUR ZALMAN GETZEL ROSENFELD

16 Dated: May 2, 2022

/s/ DAVID E. KENNER
17 DAVID E. KENNER
Counsel for Defendant
18 SHALOM IFRACH

20 Dated: May 2, 2022

/s/ VICTOR SHERMAN
21 VICTOR SHERMAN
Counsel for Defendant
22 NICK SHKOLNIK

23 **[PROPOSED] ORDER**

24 IT IS SO FOUND AND ORDERED this ____ day of May, 2022.

26 THE HONORABLE WILLIAM B. SHUBB
27 SR. UNITED STATES DISTRICT JUDGE